BSC GROUP
BUILD | SUPPORT | CONNECT

Engineers
Environmental Scientists
Software Developers
Landscape Architects
Planners
Surveyors

www.bscgroup.com

APRIL 4, 2024

Arlington Conservation Commission
730 Mass Ave Annex
Arlington, MA 02476

RE: Notice of Intent
SWCA Notice of Intent Restoration Plan Peer Review
Thorndike Place Residential Community
Dorothy Road, Arlington, MA

Dear Members of the Arlington Conservation Commission:

On behalf of Arlington Land Realty, LLC (the Applicant), BSC Group, Inc. respectfully presents the following response to SWCA's peer review report dated March 27, 2024. The March 27 letter provides closure on nine (9) out of the ten original comments, finding that there is "no further response required" to Comments 1 and 3 – 10. SWCA Comment 2 pertains to the ISMP required under the Comprehensive Permit for this project which was submitted to the Commission and to SWCA for review on March 7, 2024.

From the March 27, 2024 SWCA Peer Review letter:

SWCA Response 2-2: In SWCA's experience, the most effective way to manage sites similar to the proposed project is to utilize an adaptive management approach. The mechanical, manual, and chemical options appear to be presented as if only one can be chosen for each species. For example, common reed (Phragmites australis) and Japanese knotweed, benefit from a combined approach (e.g., cutting first at the appropriate time and then treating with herbicide at the appropriate time. There also appears to be consistent issue throughout the ISMP of misrepresenting the proposed concentrations of herbicide and not mentioning that the chose herbicide label must be followed.

SWCA recommends the ISMP be adaptative and that sticking to a strict pre-set and unchangeable schedule from year to year is not in the best interest of achieving effective invasive management. However, the first year's schedule should be specifically laid out. Depending on when construction is expected to commence (e.g., clearing, grading, etc.) the method of moving forward with treating invasive vegetation may need to be revised. If the exact start date of construction is unknown, the ISMP should be reframed that stresses the qualified invasive applicator/specialist can decide what treatment method and timing should be utilized based on site conditions. SWCA also recommends the Applicant either check the label and edit the percentages of herbicide or revise the ISMP to specify that the label rates will be followed.

BSC Response 2-2-1:
BSC is recommending an Invasive Species Management Plan that relies on the best management practices (BMP) and professional judgment of a Senior Botanist with many years of successful invasive plant management experience. An adaptive strategy that combines both mechanical and chemical approaches to maximize control of invasives while minimizing unintended impacts is presented (ISMP, page 9). It is our intent to utilize mechanical control methods to the extent practical and minimize the duration and intensity of any chemical controls employed.

The management techniques chosen for this project are specific to this location based on the species found there, proposed future activities, and specific site conditions. The proposed invasive plant species management techniques are the BMPs for this location. For example, while common reed isn't presently within the treatment area, it was included as a potential future species due to its current presence in proximity to the treatment area. Including this species as a potential future invasive species was intended as a dimension of our adaptive management approach.

BSC disagrees with the reviewer's suggestion that pre-cutting Japanese knotweed and/or Phragmites is the best approach based on the potential timing of this project and the specific reproductive biology of this plant. It is well established that both Japanese knotweed and Phragmites spread via cuttings of the stems and rhizomes. Severing plants before chemical treatment will counterproductively spur additional growth and reduce the effectiveness of chemical treatments. In our Senior Botanist's experience, plants that have been chemically treated after being cut in the same season have a decreased probability of successful eradication and instead require increased subsequent chemical use for successful treatment – which we seek to avoid.

The Invasive Species Management Plan developed for Thorndike Place is intended to be an adaptive management plan. The timetables reflect an ability to initiate the ISMP at any time of year depending on a construction schedule that will be determined in the future. We prescribe specific treatment times depending on the specific requirements of the species on the site, i.e. knotweed must be treated after flowering during September and cut-stump treatments should only be performed between July 1 and December. The purpose of the proposed treatment timetable is to allow initiation of treatment at any point in the year, with proper treatment recommendations that fall sequentially into place after the ISMP initiation.

In all cases, the intent of our adaptive approach is to use both mechanical and chemical approaches as appropriate with the overall goal of maximizing successful eradication of invasives utilizing chemical controls in the lowest concentration consistent with best management practices.

It should go without saying that any herbicide applicator will be fully licensed and trained and required to follow the law (i.e.: the label) when applying herbicide. The submitted ISMP does not recommend any deviation from product labels for any specific herbicide and is consistent with standard best management practice for their use.

We look forward to an opportunity to discuss these revisions with the Commission and its Peer Review consultant at the upcoming hearing. Mr. Groves will again be available to discuss the ISMP and is also available to answer questions that may come up during the hearing.

If you have any questions regarding the enclosed information, please contact me at (617) 896-4594 or mburne@bscgroup.com. Thank you for your consideration in this matter.

Thank you,
BSC Group, Inc.

Matt Burne, PWS
Senior Ecologist

cc: Stephanie Kiefer